DEPARTMENT OF HEALTH SERVICES

4/744 P STREET ACRAMENTO, CA 95814

December 22, 1983



To: All County Welfare Directors

Letter No. 83-82

REVISED STATEMENT OF FACTS FOR MEDI-CAL (MC 210)

The purpose of this letter is to:

- 1. Provide you with a sample copy of the revised Statement of Facts for Medi-Cal (MC 210) together with a description of the changes.
- 2. Request your comments or suggestions for future revisions.

Revised MC 210

The MC 210 has been revised to reflect program changes and to provide for documentation of mandated verifications. The current production order has been limited so that we will have the flexibility to make future changes more quickly. Because of the cost, however, current supplies of the MC 210 must be exhausted before the new revision will be available.

This revision to the MC 210 currently is being translated into Spanish. Once this process is complete, the revised Spanish version (MC 210 SP) will be printed. Because of the lead time required, it will be some months before this version will be available.

County Comments

Those questions on the MC 210 designed to identify connection to the labor force and primary wage earner were adopted from AFDC's Statement of Facts Supporting Eligibility for Assistance (CA 2). We wish to know whether these and other changes have made the form more useful in gathering the information necessary to determine Medi-Cal eligibility and share of cost. We would appreciate your written comments and suggestions on how this form can be improved in the future.

Sincerely,

ORIGINAL SIGNED BY

Caroline Cabias, Chief Eligibility Branch

Attachments

cc: Medi-Cal Liaisons

Medi-Cal Program Consultants

INSTRUCTIONS:

Attachment I

STATEMENT OF FACTS FOR MEDI-CAL

PLEASE USE INK

Your eligibility will be decided on the information you give on this form. Be sure to read and answer every item. If you need extra space for any item, see page 9.

If you are completing this form on someone else's behalf, the terms "applicant" and "you" apply to the person you are applying for. "Family member" means applicant, spouse, applicant's or spouse's

children under 21.

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3.	Do you or any family Yes Do you or any family Yes Do No Do H y	member es, list: Year / memb	Own a mo	erly Monthly arly Monthly Monthly Monthly e a life estate	Owner Oo not inclured by the	e use of) in any prucks, motorcycle de trucks), motor e county? Purchase Price \$	Yearly Deroperty? Y Sect.)? Amount Owed \$ \$ \$ Amount owed Amount Owed	es	d for ortation No No Allers Aleans of ortation	Pare Verification of	nonexempt
3.	Do you or any family Yes Do you or any family Yes Do No Do H y	member es, list: Year / memb	Own a mo	erly Monthly arly Monthly Monthly Monthly e a life estate	Owner Oo not inclured by the	e use of) in any prucks, motorcycle de trucks), motor ne county? Purchase Price	Yearly Deroperty? Y Sect.)? Amount Owed \$ \$ \$ Amount owed Amount Owed	es	d for ortation No No Allers Aleans of ortation	Pare Verification of property	DONEXEMPT EW personal
3.	Do you or any family Yes Do you or any family Yes Do No Do H y	member es, list: Year / memb	Own a mo	erly Monthly arly Monthly Monthly Monthly e a life estate	Owner Oo not inclured by the	e use of) in any prucks, motorcycle de trucks), motor ne county? Purchase Price \$	Yearly Droperty? Y Amount Owed \$ \$ \$ \$ Amount owed Amount owed \$ \$	es	d for ortation No No Allers Aleans of ortation	Pare Verification of property	DONEXEMPT EW personal
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15. DO YOU O Check each	R YOUR F item. If YE	AMILY HAV S, explain be	/E ANY OF TH ·low,	E RESO	URCES LIS	TED BELOW	/?			COUNTY USE ONLY
A. Checks (at hon	e or elecub	ara!	YES NO	1 NI-			·	YES	NO	•
B. Cash (on hand C. Checking accoun D. Savings accoun E. Credit union at F. Certificates of G. Treasury bills H. Money market	or elsewher int t count	re)		sale J. Tru K. Sto L. Oth be case	es contracts est fund , , , ecks, bonds, ner resource quickly chai h	or certificates which can nged into	· · · · · · · · · · · · · · · · · · ·	000 0		For A, B, C, D, and/or Income in the month included? Yes \(\text{No } \text{No } \text{No } \text{No } \text{ye} amount:
Type of Resou	rce	Owner	Current Value		Name and / of Banks			Account Number		For A, B, and/or C Income from business of self-employment included
			s					- Admitted	Æ.	Yes No If ye
		· · · · · · · · · · · · · · · · · · ·	<u>s</u>							\$(S ee 26C) **
26 Do			s							Date Verified EW
16. Do you or a		1. Per	son Insured	Yes _	Face Value of	If yes, list: Policy Number	Date Policy Issued	Curre Cash Value		
Α.	-	1.			\$	/ And	153060	S		Total CSV \$
<u>B.</u>		1. 2					-			Date Verified EW
C.		2.			s 🗐			\$		
17. Do you or a		ember own a	burial reserve (it owed \$	es D No C		•		Current value
For whom p	urchased	\$			<u>\$</u>					\$
From whom	purchased_				Tale and				-	Date Verified EW
18. Do you or as	•		burial plot, ka	ilt, or cr	γρt? Υι	es 🗍 No 🗆				
If for use of Description		ar than a mer	mber of the imr			olete the follo				
Estimated va				Amour	nt owed \$			· ·		
19. Do you or ar	ny family m	ember own i	tems of jewelry ms.) Yes 🗆	valued a	t more than If yes, list	\$100 each? (Do not i	nclude wed	-	
•		Descri	ption			I .	nated lue	Amoun Owed	—-{i	Heirlooms? Appraised value
A			**************************************			s		\$		\$
8.						s		\$		

or poultry	not for personal	use)? Ye	s □ No □ If yes, lis	t:		gcs.cock	COUNTY USE ONLY
		Descrip	tion		Estimated Value	Amount Owed	
Α.					s	s	
F `					s	s	
						 	
21. Have you or time since list:	or any family m you first applied	ember tran for Medi-C	sferred, sold, or given avial or during the two year	vay any propert s prior to that?	y (including m Yes D No	oney) at any If yes,	Disposition of proceeds:
	Descript	ion of Iter	n	Date of Transfer, Sale, or Gift	Value	Amount Received	
A					s	s 🚈	
₽. ়					e		Note: Refer to transfer property regs. in Title 22
22. Do you or itern. If ye "Other."	any family mer s, explain below	nber have 7. Include	any of the following sou loans, date loan received	rces of income? I, and whether	Check yes or or not loan is	no for each repayable in	
Social Security:	re), e.g., SSI/SSF FDC, GR, or GA i.e., Retirement,	• • • • •	Military re	benefits includi			Type of cash grant:
Railroad Retirem	ent			port	to the contract of the contrac		Verification (list):
bility insuran		s · · · · · ·	Payment f Monetary	from roomers gifts/contribution	ons	. 0 0	
Workers' Compen	ssation	· · · · · · · · · · · · · · · · · · ·	Other (ite	mize)			
B. Name of Pers	on Receiving Inc	eme	Type of Income	Date Received for Expected	n Amount	How Often? (Weekly, Monthly)	
				7. A.		Wolling?	THE COMMANDE
	1 1			, 			
Yes ∐ No Læst	⊃ ∐ If yes, giv	e gate of la	a cost-of-living increase to stand next cost-of-living Next	increase.			Date Verified EW
A. Rent or housing	· · · · · · · · · · · · · · · · · · ·	Who recel		From who		, 	
B. Food	Yes D No D	Who receiv	'영화:	From who	m:		
		Who receiv	res :	from who	m:		
C. Utilities	Yes D No D	Who recels	'04:	From who	m:		
D. Clothing 24. Do you or a with the dis-	ny family memberict attorney?	er pay chil	d support or alimony und	er a court order		agreement	Date Verified EW
Amount Paid			Whom	<u>~</u>	Ta Whom		#4 6: 0: 6: 6:
							<u>.</u>
MC 210 (11/83)							Page 5 of ?

	Yes D No D If yes, comp	lete the following:						COUNTY USE ONLY
Α.	1. Working member's name				·			Verification (list)
	2. Employer's name					•		☐ Wage stubs
	3. Address of employer							□ viage stubs
	4. Days of work per week			Days	Day	s	Days	
	5. Hours of work per week			Hrs.	Hn.		Hrs.	Į.
	6. How often paid (every wee every two weeks, etc.)	k, twice a month,			· · · · · · · · · · · · · · · · · · ·			· -·
	7. Day of the week you are pai	d .						
	8. Gross (total) earnings per p deductions) (include tips). write self-employed here No. 26.	If self-employed.	\$	s		s		☐ Tips
	9. Occupation					-		
5.	1. Do you pay child care necess	sary for work? Ye	s 🗆 No	□ ŝ		monthly a	mount	
	2. Do you pay for the care of a Yes No S. S. Relationship	n incapacitated adu	It living in y ly amount	our home in or Name	rder to be al	ole to work	?	Verification of dependent care
C.	Anticipated Income, If your incor in Month 1 and your estimated gros	ne varies from month : s income for the follow	to month, sho wing two mor	ow your actual greaths in Month 2 a	oss income fo nd Month 3.	r the current	-month	Date Verified EW
	Name and Occupation	Month 1	•	Month 2	, al	ام Month	3	
		\$	s		s			
			,		3			•
	· · · · · · · · · · · · · · · · · · ·	\$	\$		s			
		\$	\$		s		ļ	
	Additional Information, Expla ment which may affect future r	nonths (for example	e, temporar	/ employment)				
26,	Are you or any family member proceed to question 27. Name of business	employed?	Yes 🗀 N	o □ Ifyes, c	omplete the	following.	If no,	Verification Tax return Business records
Δ.				T-18-F-12				
	Type of business							Date Verified EW
•	Location	**:-	·	 				·
 В.	Adjusted Gross Income From	Has income Chan Since Last Tax Statement		If No Tax State	ment or Ch	ange in Inc	ome:	Net profit from self- employment:
	Last Tax Statement	Yes N	lo	Estimated Year Gross Profit		Estimated Y Business Exp		s
	\$	Money in Check	s kinn		s	···		
C. 	Cash on Hand for Business	Accounts for Bus	siness Ave	erage Monthly (Cash Expend	litures for	Business	
	\$	 \$	s					

ls a parent livi	ina in the					working less than										ON		
PLETE THE !	FOLLOW	ING F	OR 1	ГНЕ	CHILD(REN)'S PARENT	s) who is	S/ARE	LIVINO	yes, COM- S IN THE	 	Fir	म Pa ——			Esmi		
A. FIRST PAREN	IT (YF	,	 Jan-	,	Pr-	TER		_:
training history	for the p	est fiv	e year	rs. 8	egin with	this person's last jo	ob or traini). Lis ng.	t employ	/ment and		. 1 -	Mar	J	υn	Jul Sep	rt C	λ . (
Name of Employer	Work or	When	Empio	yod			Ţ	When	Employed	<u> </u>	-	s		EA	RNI	NGS		_
or Training Program	Training	To	mo d	y _, yr	Amount Paid	Name of Employer or Training Program	Training		mo dy y	Amount Paid	-	\$					\perp	_
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	⊒Work ∃Training	From To	. /	L.	□₩eekly □Monthly	12.	☐ Work ☐ Training	From	1 1	☐ Weekly ☐ Monthly	ļ	\vdash		\downarrow	\downarrow		igsquare	
B. SECOND PARE	NT OR C	THE	SPO		E for whor	n aid is requested i	name				 						$ \ $	
Begin with this p	person's l	ast job	or tr	ainia). List ei ng.	nployment and tra	ining histo	ry for 1	the past	five years.	Da	uan	ters.					
Name of Employer	Work or	When From	Employ	red /	Amount	Name of Employer	Work or		mployed		S	BCO1	nd P	ster.	π's i	Earni	ings	
Training Program	Training / Check	Τo	mo dy	γτ	Paid	or Training Program	Training / Check	From	то ду үг	Amount Paid	-			مں،	ART	ΓER		_
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lr-	JWork	From	1	, [∃Weekly		1	10.5°		\$	 	5	\dashv				L	
	Training		1		Monthly	8.	□Work □Training	From To		□Weekly □Monthly]	\$	\perp					
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L.	Training	To	1 ,	<u> </u>	Monthly	9.	Training			Monthly	P □ 1s			Wa ⊒ 2r		Earr	er Pare	ın t
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C. HAS EITHER P FITS (UIB) WIT I	ERSON HIN THE	LISTE LAST	D IN 12 M	27/ ION	A OR B R	ECEIVED UNEM	PLOYMEN	T INSU	JRANCI	BENE-		\dashv	+	+	+	+	\dashv	
	N.	ame of	Perso	'n					Received			_	_	_	1			
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210 (11/83)	•										O Eli	gibl	e			terra 7 of		

a were	30 days? If yes, complete below, Ye	s D No D	nome quit	or retused	a Job or tra	ining within the	last	COUNTY USE ONLY
Paren	nt's Name	Amount of last paycheck	Last day of	job/training ay yr.	Hours of we	ork/training in last	30 days	Employer statements
Name	and Address of Employer/Training Program	<u>\$</u>	Reason for L	/ saving or Ref	lusal			☐ Determination of
]	, - ,				"good cause" required
								· ·
		•						1.4
		** =						
	n de la companya de La companya de la co						والمحي	
В.	Are you or anyone in your family par	ticipating in a	labor strike?	Yes 🗆	No □ I	f yes, complete.	de de la companya de	☐ Striker(s)
who				Date Persor	Went on Sti	rike 🕃		<u>1</u>
		the state of the s					***	in the second se
29.	Are you or any family member in collif yes, complete the following: Full-	llege or attend -Time □ Pa	ing a similar rt-Time 🔲	educationa	l institution	n? Yes 🗆 No		
		Student:		Student:		Student:		
A. 1.	Name of institution			<u> </u>				*
	Status of student			C - 1 D 11		Gred D Underg		
		USPO U	Dindergrad LJ	G:80 L1 U	incergrad L	Grac Eq. Onders	רו מפרו	
	rants, loans, scholarships, fellowships			·	<u> </u>			Verification (iist);
	Amount received	S		s		\$		
2.	Source(s) of grants, loans, etc.	<u> </u>	· · · · · · · · · · · · · · · · · · ·					Date Verified EW
3.	How often received				The state of the s			Exempt:
C. E	xpenses Per Term			, in				☐ Entire amount
1.	ls term a semester, quarter, year		· 4					Only expenses
2.	Tuition/fees -	s	ofin∈:	s -		\$		
3.	Books, equipment, and supplies	\$		S		s		
4.	Child care necessary for school	s		\$.		\$		
5.	Transportation to school-child care		**** *********************************	1				Transportation costs
	a. Round trip miles per day		and the	T				allowed: (show compute tion)
	b. School attended how meny days	The second						
	pe- week							
	c. Type of transportation used (own car, someone else's car, car pool, bus, etc.)	The second secon			•			
	d. Costs (per month)		髮					
	Amount paid by student (if doesn't use own car)			-				
	Amount paid by riders			\s		\$ \$		
	Destrict and the same		·	3		1		
*****	is public transportation (bus, train, etc.) available	Yes	Cost	Yes 🔲	Cost	Yes 🗆 Cos	i 1	
····				No DIS		No \$		
30.	Do you or any family member have M			O No □	If yes, list			
	Person Covered	t .	dicare Number	Deduction I		Premium		
 А.		Gail.		Yes		Paid by Yo Yes □ No		
				Yes 🗆		<u> </u>		Date Verified EW
B. ——				 		Yes No		
C.	•			Yes □	No 🗆	Yes No	L	

	omplete the following	g:		·Cdi,		COUNTY USE ONLY
- Coverage (Check)		Perso	on(s) Insured	Pre	Monthly mium Paid	-\
☐ CHAMPUS/CHAMPV		····		s		Dete HRB 2 completed
Veterans Administration (50% or above disability	on coverage by rating)			S		-
☐ Kaiser				s		Other health coverage
☐ Ross-Loos (INA)				s		code entered
☐ Blue Shield				s		Verification (list)
☐ Blue Cross				s	<u> المنابع</u> المنابعي	
☐ Other				s		Date Verified EW
32. Have you or any family my Yes No 11 yes,	ember made a down	payment for m	edical care you will	receive in the	future?	Payment used to brin property within propert limits Yes No
Amount of Down Payment	To Whom I	Made	Medical Car	e to be Rece	ved	If yes:
33 4 11				-		D Notice to provider
33A. Have you or any family men					<u>:</u>	CAS D
B. Are you or any family me service? Yes . No .	mber the spouse, pa	rent, or child of	a person who has b	een in U.S.	military	CA 5 🗍
 Have you or any family me any payment/s you are not 	ember applied for or now receiving? Yes	do you or any	family member think f yes, complete the fo	k you are eli dlowing:	jible for	
Kind of Payment	Person Possib	ly Eligible	Date of Application Month/Day/Year	Date Ex Month/D	•	
Social Security						
ability payments			un de la companya de			Date Verified EW
veteran's payments		•				
Unemployment Benefits						
Workers' Compensation	·	C-4-12			-	Medi-Cal racovery referrat
Medicare						Date
Pending suit or insurance settle- ment for accident or injury		7:2 ··				Date of accident/injury
Other: Describe						Medi-Cal recovery referral
•	No. of the state o					Date
35. Services (these questions do A. Are you interested in Health Dirability Present	physical examinatio	ns for any fami		through th	o Child	☐ CHDP brochure given
Health Disability Preven	tion Program? Yes	□ No □	, women and a	i anoogii (ii	e Gillo	Date
B. Are you interested in in	formerion on the Fa	mily Planning Pr	ogram? Yes 🗆 N	o 🗆		CHDP referral
C. Are you interested in to you? Yes \(\sime\) No	alking to a social ser	vices worker abo	out other services wh	ich may be a	vailable	Social services referral
10 7001 765 11 110	□ 11 λež šxbigiu:					
66. Additional information, Plea	se give the item num		in to the left			
		the cordin	to bit left.	,		
						•
						

BE SURE YOU HAVE READ EVERY ITEM AND ANSWERED ALL THE QUESTIONS. READ THE FOLLOWING CAREFULLY BEFORE SIGNING.

- I agree to tell the county welfare department within TEN DAYS if there are any changes in my
 (or the person's on whose behalf I am acting) income, possessions, or expenses or in the number
 of persons in the household or of any change of address or of any change in other health insurance coverage; and I agree to meet all other responsibilities explained in the "Medi-Cal Responsibilities Checklist" I have received.
- I understand that I must report immediately the death of a member of my household or the person on whose behalf I am acting.
- I understand that the information I put on this form will be verified and that I must cooperate
 fully in any investigation required for quality control.
- I understand that Section 700.1 of the Probate Code and Section 14009.5 of the Welfare and Institutions-Code provide for the recovery of all Medi-Cal benefits received after age 65 from the estate of a Medi-Cal beneficiary if there is no surviving spouse, minor children, or blind or totally disabled children.
- I understand that any information gathered is confidential and not open to inspection other than for purposes directly connected with the administration of the Medi-Cal program.
- I understand that if I am dissatisfied with actions taken by the county welfare department, I have the right to a state hearing.

IF YOU DO NOT UNDERSTAND THESE STATEMENTS OR IF YOU HAVE ANY QUESTIONS, ASK YOUR COUNTY WORKER TO EXPLAIN.

I REALIZE THAT IF I DELIBERATELY MAKE FALSE STATEMENTS OR WITHHOLD INFORMATION, I (OR THE PERSON ON WHOSE BEHALF I AM ACTING) MAY LOSE MY MEDI-CAL CARD AND/OR I CAN BE PROSECUTED FOR FRAUD.

I DECLARE UNDER PENALTY OF PERJURY THAT THE ANSWERS I HAVE GIVEN ARE CORRECT AND TRUE TO THE BEST OF MY KNOWLEDGE.

V.	· · · · · · · · · · · · · · · · · · ·	
Signature of Applicant	A CONTRACTOR OF THE CONTRACTOR	Date
Signature of Person Acting for Application	Relationship	Date
Signature of Witness (If Applicant Signed With Mark)		Date
Signature of Person Helping Applicant Complete Form	Address	Date
COUNTY USE ONLY	EW Signature	
	Date	
		-

Revised Statement of Facts for Medi-Cal Description of Changes

The format of the MC 210 has not been changed. In sequence, the format is: 1) personal identification and program identification; 2) resource identification; 3) income identification; 4) linkage to AFDC; 5) other health coverage; 6) potentially available assistance.

Please note that in the numbering sequence, questions 1 through 22 remain unchanged. However, questions 23 through 35 are rearranged as follows:

Current	Revised	Current	Revised	Current	Revised
23	25	27	24	32	34
24	26	28	31	33	27, 28
25	. 23	29	30	34	35
26	29	30	32	35	36
		31	33		

Page 1

County Use Column

-- Added verification of identity. Title 22 CAC 50167 (a)(6) requires verification of the identity of at least one parent or adult member of the case. Case review indicates that many eligibility workers (EWs) either fail to verify identity or fail to document such verification.

Page 2

Question 6

-- Reworded this question. The current MC 210 asks if all applicants are citizens. The actual intent is to question alien status. This revision, which is adapted from the AFDC Statement of Facts Supporting Eligibility for Assistance (CA 2), clearly identifies that the question concerns alien status.

Question 7

-- Redrafted this question to identify specific aid programs. The current MC 210 is inadequate for identifying potential Title II Disregard status.

County Use Column

-- Removed reference to property spenddown.

Question 9

-- Added new item c. This question is intended to specifically question applicants claiming disability as to whether a lawsuit/insurance settlement is pending. Quality Control (QC) reviewers have identified cases in which applicants have failed to disclose pending lawsuits. This question should increase identification of potential third party liability.

County Use Column

-- Added referral to Medi-Cal Recovery to Question 9C. to remind EWs of this requirement.

Page 3

Question 10

-- Added "monthly payment" to question regarding amount of mortgage payment. This allows comparison of monthly income to monthly expenses and can help identify discrepancies.

County Use Column

-- Added verification statements for Questions 11, 13 and 14. Title 22, CAC, 50167 requires that EWs verify the information contained in these questions. Some EWs fail to document such verification.

Page 4

Question 15

-- Revised this question in order to save space. This format is used in the CA 2 and is slightly more detailed.

County Use Column

-- Added verification statements for questions 15, 16, 17 and 19. Inappropriate treatment of these resources has caused QC errors. Some EWs fail to document verification, fail to update CSV of insurance or value of a burial reserve or trust after the initial application. In addition, verification of this information is required by 22 CAC 50167.

Page 5

Question 22

- -- Rearranged this question in order to save space.
- -- Added military retirement since it is not clearly identified on the current form.
- -- Added sub-item C, based upon a recommendation by Quality Control and Evaluation Branch.

Question 23. (formerly question 25)

-- Moved this question in order to conserve space.

Question 24. (formerly question 27)

-- Moved this question in order to conserve space.

Page 6

County Use Column

-- Added verification instructions to questions 25 and 26 (formerly questions 23 and 24) because EWs very seldom list the type of verification provided. In addition, some EWs neglect to verify the cost of dependent care.

Page 7

Question 27 (formerly part of question 33)

-- Revised completely the question on unemployed parent(s). The current MC 210 does not contain any questions about primary wage earner. In addition, current question 33 is inadequate for identifying connection to the labor force. These two factors are a main requirement for linkage to AFDC based on an unemployed parent (22 CAC 50215 (b) and (c)). QC reviews indicate deprivation errors cause between 10 and 20 percent of the State's erroneously paid Medi-Cal dollars. Therefore, this question must be clarified.

The format for this question was adopted from AFDC's CA 2.

Page 8

Question 28 (formerly part of question 33)

-- Revised question and moved from question 33. This question also was adopted from the CA 2. Federal and State law and regulation prohibit AFDC/MN linked Medicaid/Medi-Cal coverage for persons refusing a job without good cause or for participating in a strike. (See also 22 CAC 50215 (b) and (c)).

Question 29. (formerly question 26)

No change.

Question 30. (formerly question 29)

No change.

Page 9.

Question 31. (formerly question 28)

-- Revised this question in conformity with Recovery Branch input.

County Use Column

- -- Added check for coding other health coverage.
- -- Added verification requirement. Title 22, CAC, Section 50167 (a)(7)(T) requires verification of available health care benefits. EWs do not always obtain the type of verification required.
- -- Added referral for Medi-Cal Recovery to question 34 (formerly question 32). Title 22, CAC, Section 50771 requires county departments to notify the State of potential third party payments (TPL). The additions to the verification requirements in question 34 should remind EWs of this requirement.

Page 10. Informational Statements

- -- Moved penalty of perjury statement to immediately above signature block.
- -- Added phrase on other health coverage to reporting responsibilities statement.
- -- Added statement on reporting death of a beneficiary.
- -- Revised statement on verification of information and QC investigations.

- -- Added "blind" child to statement on recovery from the estate of a decedent beneficiary.
- -- Revised and limited statement on confidentiality.